



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

September 13, 2005

Curt Frye, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2096

RE: Draft Sediment and Groundwater Monitoring Report, Old Fire Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Frye,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Sediment and Groundwater Monitoring Report, Old Fire Fighter Training Area. Attached are comments generated as a result of this review. If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Cornelia Mueller, NSN

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30% post-consumer fiber

**Comments on
Draft Sediment and Groundwater Monitoring Report,
Old Fire Fighter Training Area**

**1. Section 4.1 Groundwater,
Page 4-1, Whole Section.**

This section of the report deals with contaminants of concern found in the groundwater. Waste oils were the primary contaminant disposed of at the site. Despite this fact this section of the report does not discuss petroleum contamination. Please modify this section to include a discussion of petroleum contamination in the groundwater including the presence of sheens, smear zones, TPH results, etc.

**2. Section 4.2.1 Non Forensic Analysis,
Page 4-3, 1 st Paragraph.**

This paragraph states that overall PAH concentrations are decreasing across the site. A review of the data indicates that changes in concentration are variable. That is, contaminants may decrease with time, increase with time or fluctuate. The section of the report must clearly note this fact.

**3. Section 4.2.1 Non Forensic Analysis,
Page 4-3, 1 st Paragraph.**

This section of the report indicates that overall PAH concentrations are decreasing across the site. The report is a public document, and it is difficult for the public to review each sample location and each contaminant over time to evaluate trends. A visual aid to the public to see overall trends would be to place a field at the end of each sampling stations. In the field the letters I, D or F would be placed designating an increase, decrease or fluctuation in contaminant concentrations over time. The field could also be color-coded, i.e. a different color for each designation. This would allow the public to scan the results and get an over feel for trends.

**4. Section 4.2.1 Non Forensic Analysis,
Page 4-3, Third Paragraph.**

This section of the report notes that inputs from rubberizing asphalt and building debris may have affected PAH distribution. Please explain in detail these sources and how they could have leached chemicals into the environment (i.e. was construction debris recently disposed of at the site, was rubberizing asphalt recently used at the site, was PAH concentrations observed to be higher adjacent to the construction debris or rubberizing asphalt etc).

**5. . Section 4.2.1 Non Forensic Analysis,
Page 4-3, 4 th Paragraph.**

This paragraph states that PAH concentrations decrease with depth. In support of this position please provide a set of tables that clearly delineates the depths of the samples for all sample locations throughout time (i.e. for each sampling event). Further graphs of either total PAHs or PRG PAHs should be created which depict sample concentrations versus depth for the different sampling events.

**6. . Section 4.2.2 Forensic Analysis,
Page 4-3, Whole Sections**

In previous correspondence and meetings the Office of Waste Management raised a number of questions concern the validity of the original forensic study performed at the site and the conclusions generated by the study. Accordingly, the study was not approved, and the Office of Waste Management stated that conclusions presented in the study could not be used as a foundation for decisions made at the site. The Navy then proposed to perform a second similar study. At that time the Office of Waste Management noted that it's position concerning this matter has not changed. Specifically, the Office of Waste Management did not approve the proposal of performing a similar forensic study, nor will it accept any conclusions generated from such a study or any positions based upon such a study. At this time the Office of Waste Management position on this issue has not changed and comments will not be submitted on the forensic portion of this report.